

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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KHAIRUL ANNAM and NAHEED AFROZ,

Plaintiff,

-against-

CITY OF NEW YORK, NEW YORK CITY  
DEPARTMENT OF BUILDINGS, MELANIE E.  
LA ROCCA, Commissioner, TIMOTHY E.  
HOGAN, MATTHEW MILLNER, LEONID  
MILLER, YEGAL SHAMASH, GEOFFREY B.  
EISELE, JOSEPH ACKROYD, KEVIN  
SCHULTZ, MATTHEW DIBONO, LISTORIEL  
VASQUEZ,

Defendants.

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**DECLARATION OF ASSISTANT  
CORPORATION COUNSEL  
STEPHEN M. SUHOVSKY IN  
SUPPORT OF DEFENDANT'S  
MOTION TO DISMISS**

No. 22 Civ. 02945 (LGS)

**STEPHEN M. SUHOVSKY**, pursuant to 28 U.S.C. § 1746, and subject to the  
penalty of perjury, declares that the following is true and correct:

1. I am an Assistant Corporation Counsel in the office of the Honorable Sylvia  
O. Hinds-Radix, Corporation Counsel of the City of New York, and the attorney for Defendants  
in the above-captioned matter.

2. I respectfully submit this declaration in support of Defendant's Motion to  
Dismiss the Second Amended Complaint.

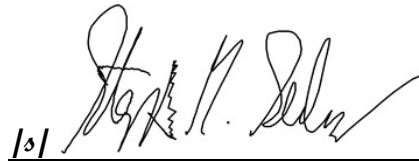
3. Annexed hereto as Exhibits "A" is a copy of Second Amended Complaint.

4. Annexed hereto as Exhibit "B" is a true and accurate copy of the Plaintiffs'  
Notice of Claim.

5. Annexed hereto as Exhibit "C" is a true and accurate copy of the Plaintiffs'  
Complaint filed in New York State Supreme Court.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
September 7, 2022

A handwritten signature in black ink, appearing to read "Stephen M. Suhovsky", is written over a horizontal line. To the left of the signature, the text "/s/" is written.

Stephen M. Suhovsky  
Assistant Corporation Counsel